

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**WSOU INVESTMENTS, LLC D/B/A
BRAZOS LICENSING AND
DEVELOPMENT,**

Plaintiffs,

v.

ARISTA NETWORKS, INC.,

Defendant.

Civil Action No. 6:20-cv-1083-ADA

DECLARATION OF MOHAN KALKUNTE

I, Mohan Kalkunte, hereby declare:

1. I have been employed by Broadcom (and related companies) since 1998 and my current role is Vice President (Architecture and Technology). I am familiar with Broadcom's locations and personnel in the United States related to the technology discussed in this declaration, and the nature and types of work conducted at these locations. In addition, I have supplemented my personal knowledge gained through my work at Broadcom with an investigation of corporate records. I declare that the following statements are true to the best of my knowledge, information, and belief, formed after a reasonable inquiry under the circumstances. If called upon to testify, I could and would competently testify thereto.

2. Broadcom maintains its corporate headquarters at 1320 Ridder Park Drive, San Jose, California, 95131, as well as maintaining multiple other facilities in and around San Jose.

3. I am informed that WSOU Investments has filed a patent infringement case against Arista Networks. I am further informed that WSOU Investments has directed its

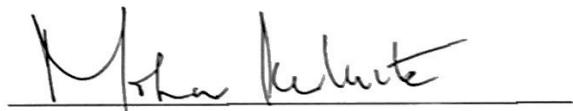
infringement allegations for one of the asserted patents in that case—the “884 patent”—against architecture related to Virtual Output Queues (VOQs) and Advanced EOS features for network monitoring, precision timing, VXLAN network virtualization, and EVPN, in Arista’s switches, including but not limited to Arista 7500R Series, 7500R3 Series, 7800R3 Series, 7280R3 Series, 7280R Series, and 7020R Series switches.

4. Arista is a customer of Broadcom. Broadcom supplies Arista with the switching chips that Arista uses in the accused switches specified in paragraph 3 above. As one of my responsibilities, I manage the design and development work on these chips, which is carried out by Broadcom employees in Israel. I am therefore informed about the design and development of these chips, and regularly receive information about their features and operation. Broadcom documents and information relating to the design and development of these chips are created and kept in Broadcom’s Israel and San Jose facilities. In addition, the documentation about these chips that Broadcom provides or otherwise makes available to customers, and the marketing information about these chips that Broadcom makes available to the public, is created and kept by personnel working in Broadcom’s San Jose and Israel facilities. To the extent that Broadcom is called upon to produce documents from its United States facilities concerning these chips, Broadcom expects that those documents will be collected and produced from its San Jose facilities. Likewise, to the extent that Broadcom is called upon to produce one or more U.S.-based witnesses to testify about these chips, Broadcom expects that I or other personnel from its San Jose facilities would be asked to testify.

5. If I (or other San Jose-based Broadcom employees) am called upon to testify at trial, it would be far more convenient for us—and for the company—if we were to testify in Northern California than in Waco, Texas. For example if the trial were held in San Jose, San

Francisco, or Oakland, California, I could drive to court on the day of my testimony and drive home that same day. By contrast, if the trial were to take place in Waco, Texas, I would need to travel approximately 1,500 miles to Waco, which would require one or two travel days in addition to my day of testimony. This would require me to spend multiple days away from my family, would increase the amount of time lost from work, and would impose substantial expense on the company. Given the specific issues for which I understand that I or other Broadcom witnesses may be called to testify in this lawsuit, outlined above, a trial in Northern California would be far more convenient for Broadcom and its employees than a trial in Waco, Texas.

Executed in San Jose, California, on June 14, 2021.

A handwritten signature in black ink, appearing to read "Mohan Kalkunte", is written over a horizontal line.

Mohan Kalkunte